

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

Attorney General Jim Hood, *ex rel.*
State of Mississippi,

Plaintiff,

v.

Case No.: 3:11-cv-00343-HTW-LRA

The McGraw-Hill Companies, Inc.,
Standard & Poor's Financial Services, LLC,
Moody's Corporation and Moody's Investors
Service, Inc.,

Defendants.

**STATE OF MISSISSIPPI'S RESPONSE TO STANDARD & POOR'S APRIL 3, 2013
MOTION TO STAY RESPONSES TO MOTION TO REMAND,
OR IN THE ALTERNATIVE, FOR EXTENSION OF TIME**

COMES NOW, Plaintiff, Attorney General Jim Hood, *ex rel.* State of Mississippi ("State" or "Mississippi") and requests that this Court deny defendants The McGraw-Hill Companies, Inc. and Standard & Poor's Financial Services LLC's (collectively, "S&P") April 3, 2013 Motion to Stay Responses to [the 2013] Motion to Remand, or In the Alternative, for Extension of Time ("Motion to Stay Response to 2013 Motion to Remand").

S&P's response to Mississippi's 2013 remand motion was due on April 3, 2013. On April 3, S&P filed its Motion to Stay Response to 2013 Motion to Remand in lieu of filing a response to the remand motion, thus granting itself a *de facto* stay. S&P's *de facto* stay is improper and prejudices Mississippi by delaying the resolution of Mississippi's 2013 Motion to Remand and the overall prosecution of the State's action. S&P also has not demonstrated good cause for an extension of time to file its response to the State's 2013 Motion to Remand.

For the reasons stated in this response and accompanying memorandum, as well as in Mississippi's Response to S&P's Motion to Stay All Proceedings and accompanying memorandum, ECF Nos. 42 and 43 (incorporated herein by reference), Mississippi respectfully requests that this Court deny S&P's Motion to Stay Response to 2013 Motion to Remand and grant the State's 2013 Motion to Remand as unopposed or, in the alternative, order S&P to immediately file its response to that motion.

Respectfully submitted this the 4th day of April, 2013.

Plaintiff, State of Mississippi, *ex rel.* Jim Hood,
Attorney General

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CERTIFICATE OF SERVICE

I, Betsy Miller, do hereby certify that I have this day delivered a true and correct copy of the foregoing Response via the Court's electronic filing system, to the following:

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So Certified, this the 4th day of April, 2013.

/s/ Betsy Miller
Betsy Miller